

INTERNATIONAL MILITARY TRIBUNAL  
FOR THE FAR EAST

- 1 -

THE UNITED STATES OF AMERICA, et al

- vs -

ARAKI, Sadao, et al

- Defendants -

MOTION FOR PRODUCTION OF WITNESSES

1. COMES NOW NAGANO, Osami and OKA, Takasumi being accused now on trial before this Tribunal, and in accordance with Section III, Article 9 (e) of the Charter as well as Order No. 492 of the Tribunal, respectfully request an order for the production of the following named witnesses considered necessary in their respective defenses.

A. TOYODA, Soemu;

- (a) Nationality of the witness is Japanese.
- (b) He was an Admiral in the Japanese Navy and was in attendance at negotiations pertaining to the London Naval Conference. He is at present confined in Sugamo Prison.
- (c) His testimony is considered relative to the defense of the above accused and concerns matters mentioned in Appendix A, Section Three of the Indictment.

B. FUKUTOME, Shigeru;

- (a) Nationality of the witness is Japanese.
- (b) He was a Vice-Admiral in the Japanese Navy and at present is in Singapore, although it is believed that he is not confined as a prisoner of war.
- (c) This witness is desired because of Defense's belief that he was a liaison officer between the Naval General Staff and the Foreign Ministry. His testimony is considered necessary in regard to Counts 7, 20 and 39 of the Indictment.

C. OKOCHI, Denshichi;

- (a) Nationality of the witness is Japanese.
- (b) He was a Vice-Admiral in the Japanese Navy and is at present in Manila, believed to be a prisoner of war.

*Good for  
Nov 20  
Per 7(6)*

- (c) His testimony is desired for the purpose of answering allegations in Appendix A, Section Nine of the Indictment, since witness was Commanding Naval Officer at the time of the matters mentioned in the Indictment pertaining to Shanghai.

D. ONODA, Sutegiro;

- (a) Nationality of the witness is Japanese.
- (b) He was a naval captain and assistant to the above named FUKUTOME. He is believed to be in Singapore at the present time although not a prisoner of war.
- (c) As assistant to the above named FUKUTOME, it is believed this witness may be able to supply information vital to the Defense in regard to liaison matters between the Naval General Staff and the Foreign Ministry.

2. It is respectfully represented to the Tribunal that the particular time that each witness may be required to appear and testify can not at this time be accurately stated, but their attendance for examination and consultation by counsel for accused is considered necessary forthwith.

3. The above named accused have joined their requests for witnesses in this one document since they are naval defendants and consider the witnesses so requested as necessary for each of their respective defenses.

WHEREFORE the above accused pray for an order of the Tribunal as before stated and for such other and further relief which the Tribunal deems meet and just.

Dated, Tokyo, Japan  
12 November 1946

NAGANO, Osami  
by his counsel

\_\_\_\_\_  
OKUYAMA, Hachiro  
and

\_\_\_\_\_  
John G. Brannon



- (c) His testimony is desired for the purpose of answering allegations in Appendix A, Section Nine of the Indictment, since witness was Commanding Naval Officer at the time of the matters mentioned in the Indictment pertaining to Shanghai.

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and

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John G. Brannon

OKA, Takasumi  
by his counsel

SOMIYA, Shinji  
and

Franklin E. N. Warren